

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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In Re:

WILLIAM M. WINFIELD  
*aka* BILL M. WINFIELD

Debtor.

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U.S. BANK, NATIONAL ASSOCIATION  
AS LEGAL TITLE TRUSTEE FOR  
TRUMAN 2016 SC6 TITLE TRUST

Movant,

v.

WILLIAM M. WINFIELD

Debtor,

And

Jack N Zaharopoulos

Trustee,

Respondents.

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:  
:CHAPTER 13  
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:CASE NO. 5:18-bk-03284-MJC  
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:Judge: MJC  
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**STIPULATION RESOLVING MOTION OF U.S. BANK, NATIONAL ASSOCIATION  
AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST FOR RELIEF  
FROM THE AUTOMATIC STAY TO PERMIT MOVANT TO EXERCISE ITS  
RIGHTS UNDER STATE LAW AGAINST CERTAIN REALTY KNOWN AS  
271 SENECA DRIVE, MILFORD, PENNSYLVANIA 18337**

THIS matter being opened to the Court by Emmanuel J. Argentieri of the law office of Romano Garubo & Argentieri, counsel for the secured creditor, U.S. Bank, National Association As Legal Title Trustee For Truman 2016 SC6 Title Trust, (hereinafter “Movant”), upon the filing of a motion for relief from stay as to real property, more

commonly known as 271 Seneca Drive, Milford, Pennsylvania 18337, and Debtor having filed a response to the motion through her counsel, Mark E. Moulton of Moulton & Moulton PC, and it appearing that the parties have amicably resolved their differences and for good cause shown; It is hereby Ordered:

1. The Movant's servicer has removed the escrow shortage retroactive to September 21, 2021.
2. Debtor's post-petition mortgage account is now due for the May 21, 2023 post-petition payment, with \$232.47 in suspense balance.
3. Movant advanced the sum of \$4,407.46 for property and school taxes connected to the subject property.
4. Commencing with the May 21, 2023 post-petition payment and continuing each month thereafter through and including June 21, 2024, Debtor shall cure the aforesaid arrearages by remitting regular monthly mortgage payments, plus 1/14 of the above arrearage (\$314.82).
5. Commencing with the July 21, 2024 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.
6. If the case is converted to a Chapter 7, the Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay.
7. If any of the aforementioned stipulation payments and/or regular monthly mortgage payments commencing after the cure of the post-petition delinquency are more than thirty (30) days late, Movant may send Debtor a written notice of default of this

Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property herein.

*The undersigned hereby consent to the form and entry of the within order.*

/s/Emmanuel J. Argentieri  
Emmanuel J. Argentieri, Esquire  
*Attorney for Movant*

Date: 4/18/2023

Mark E. Moulton  
Mark E. Moulton, Esquire  
*Attorney for Debtor*

Date: 04/25/2023

Agatha R. McHale, Esq.  
Agatha R. McHale, Esquire  
*On behalf of Jack Zaharopoulos*  
*Chapter 13 Trustee*

Date: 4/25/2023